

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	HON. GENE E.K. PRATTER
	:	
v.	:	CRIM. NO. 18-101
	:	
	:	
MEHDI NIKPARVAR-FARD	:	

ORDER

AND NOW, this \_\_\_\_\_ day of August, 2023, upon consideration of the defendant's *Third Motion to Extend Modification of Conditions of Release*, it is hereby **ORDERED** that the said Motion is **GRANTED**. The modification of defendant's conditions of release which permit him to be at 122 East 3<sup>rd</sup> Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week is extended until October 1, 2023. It is further **ORDERED** that the status of the completion of the repairs shall be reported to the Court in thirty (30) days hence.

By the Court:

\_\_\_\_\_  
HON. GENE E.K. PRATTER  
JUDGE, U.S. DISTRICT COURT

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MEHDI NIKPARVAR-FARD	:	

THIRD MOTION TO EXTEND MODIFICATION OF CONDITIONS OF RELEASE

The defendant, Mehdi Nikparvar-Fard, by his counsel, Caroline Goldner Cinquanto, Esquire, respectfully requests that this Court grant his *Third Motion to Extend Modification of Conditions of Release* and in support thereof states the following:

1. On July 7, 2022, the Honorable Gene E.K. Pratter ordered that the defendant, Mehdi Nikparvar-Fard, be subject to location monitoring by a Global Positioning Device and not leave 400 Fairview Road, Penn Valley, Pennsylvania without the prior authorization of pretrial services or the Court [Doc. No. 433, ¶8].

2. On April 14, 2023, this Court granted defendant's *Motion to Modify Conditions of Release* which permitted the defendant to be at 122 East 3<sup>rd</sup> Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week in order to perform necessary repairs on the home. The Court further ordered that the defendant provide the Court with the status of the completion of the repairs sixty (60) days from the date of the Order [Doc. No. 604].

3. On June 22, 2023, this Court issued an Order extending its April 14, 2023 Order modifying the defendant's conditions of release which permitted the defendant to be at 122 East 3<sup>rd</sup> Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week in

order to perform necessary repairs on the home for an additional period of thirty days. This Court further Ordered that the defendant provide the Court with the status of the completion of the repairs no later than July 22, 2023 [Doc. No. 619].

4. On July 18, 2023, this Court issued an Order extending its June 22, 2023 Order modifying the defendant's conditions of release which permitted the defendant to be at 122 East 3<sup>rd</sup> Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week in order to perform necessary repairs on the home until Friday, September 1, 2023. This Court further Ordered that the defendant provide the Court with the status of the completion of the repairs no later than August 18, 2023 [Doc. No. 623]<sup>1</sup>.

5. The status of the completion of the house located at 122 East 3<sup>rd</sup> Street in Pottstown is as follows: The concrete for the sidewalk has been replaced; a new sewer and water line has been installed; the HVAC duct work is complete; both the plumbing and electric work is done. Mr. Nikpavar-Fard is currently fire blocking the home, which involves installing materials to prevent the movement of undetected flames and gases throughout the home.

6. Neither AUSA Mary Kay Costello nor Pretrial Officer Charles Meissler object to the extension of the modification of the defendant's conditions of release for an additional thirty (30) days.

7. The defendant's location monitoring payments are paid in full.

In conclusion, it is respectfully requested that the Court issue an Order extending the modification of the defendant's conditions of release which currently permits him to be at 122 East 3<sup>rd</sup> Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a

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<sup>1</sup> Due to an administrative error on the part of counsel, this status report is being filed three days late. Counsel apologizes for this error and assures the Court that an error of this sort will not happen again.

week until October 1, 2023, with the requirement that the defendant provide a status of the completion of the repairs to the Court within thirty (30) days.

Respectfully submitted,

/s/ Caroline Goldner Cinquanto

Caroline Goldner Cinquanto  
Two Greenwood Square  
3331 Street Road, Suite 450  
Bensalem, PA 19020  
O (215) 910-2732; F (215) 689-0812  
[Carrie@cgclegal.com](mailto:Carrie@cgclegal.com)

Counsel for Mehdi Nikparvar-Fard

Dated: August 21, 2023

CERTIFICATE OF SERVICE

I, Caroline Goldner Cinquanto, hereby certify that on this date I delivered by electronic means a true and correct copy of the foregoing Motion to the following counsel:

AUSA Mary Kay Costello  
United States Attorney's Office  
615 Chestnut Street, Suite 1250  
Philadelphia, PA 19106

//s// Caroline Goldner Cinquanto  
Caroline Goldner Cinquanto  
Two Greenwood Square  
3331 Street Road, Suite 450  
Bensalem, PA 19020  
O (215) 910-2732; F (215) 689-0812  
[Carrie@cgclegal.com](mailto:Carrie@cgclegal.com)

Dated: August 21, 2023